

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States District Court
Southern District of Texas
FILED

IN RE: BP P.L.C. SECURITIES)
LITIGATION) No. 4:10-MD-2185
)
) Honorable Keith P. Ellison
THIS DOCUMENT RELATES TO:)
Ohio Public Employees Retirement System,) MOTION TO REMAND
et al. v. BP p.l.c., et al.)
No. 1:12-01291)

JUN 21 2012

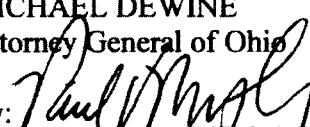
David J. Bradley, Clerk of Court

Pursuant to 28 U.S.C. §§ 1441 and 1447, Plaintiffs Ohio Public Employees Retirement System, the State Teachers Retirement System of Ohio, the School Employees Retirement System of Ohio, and the Ohio Police and Fire Pension Fund (collectively, "Plaintiffs") move to remand this case to the Court of Common Pleas, Cuyahoga County, Ohio, where it was originally filed. Plaintiffs make this motion on the grounds that this Court lacks subject matter jurisdiction over any of the claims asserted in this case and the removal by Defendants BP p.l.c., BP America Inc., BP Exploration and Production Inc., Anthony B. Hayward, Douglas Suttles and Andrew G. Inglis (collectively, "Defendants" or "BP") was improper.

The grounds for this motion are fully set forth in Plaintiffs' Memorandum of Law In Support of Their Motion to Remand, filed concurrently herewith.

Respectfully submitted,

MICHAEL DEWINE
Attorney General of Ohio

By: 
Gregory M. Utter (0032528)
Paul V. Muething (0032527)
Brian P. Muething (0076315)
W. Jeffrey Sefton (0075671)
KEATING, MUETHING & KLEKAMP PLL
One East Fourth Street
Suite 1400

Cincinnati, Ohio 45202
Phone: (513) 579-6400
Fax: (513) 579-6457
gmutter@kmklaw.com
pmuething@kmklaw.com
bmuething@kmklaw.com
jsefton@kmklaw.com

J. Pierre Tismo, Esq.
Dyer, Garofalo, Mann & Schultz
131 N. Ludlow St., Suite 1400
Dayton, OH 45402
Phone: (937) 223-8888
Toll Free: (800) 223-8897
Fax: (937) 824-8630
ptismo@dgmrlaw.com

Attorneys for Plaintiffs, Ohio Public Employees Retirement System, the State Teachers Retirement System of Ohio, the School Employees Retirement System of Ohio, and the Ohio Police & Fire Pension Fund

Special Counsel for the Attorney General

OF COUNSEL

BERMAN DEVALERIO

Glen DeValerio
Kristin J. Moody
Steven J. Buttacavoli
One Liberty Square
Boston, MA 02109
Phone: (617) 542-8300
Fax: (617) 542-1194

BLOCK & LEVITON LLP

Jeffrey C. Block
Jason M. Leviton
Whitney E. Street
Mark A. Delaney
155 Federal Street, Suite 1303
Boston, MA 02110
Phone: (617) 398-5600
Fax: (617) 507-6020

CERTIFICATE OF SERVICE

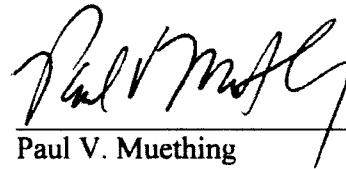
I hereby certify that on the 21st day of June, 2012 a true and exact copy of the foregoing was served by United States mail, postage prepaid, addressed as follows:

Frances Floriano Goins
Isaac J. Eddington
ULMER & BRENE LLP
Skylight Office Tower
1660 West 2nd St., Suite 1100
Cleveland, Ohio 44113-1448

OF COUNSEL:

Richard C. Pepperman, II
Marc De Leeuw
SULLIVAN & CROMWELL LLP
125 Broad St.
New York, New York 1004-2498

Daryl A. Libow
Amanda F. Davidoff
SULLIVAN & CROMWELL LLP
1701 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-5805



Paul V. Muething